Performance and Tracking Metric Proposal Template

Illinois Commerce Commission

Public Act 102-0662

STEP 1: PERFORMANCE METRIC PROPOSALS

Instructions. Use this template to propose performance metrics that the Illinois Commerce Commission should consider pursuant to the directives in the Illinois Energy Transition Act.[1] Metric proposals will support stakeholder discussion of utility performance metrics and inform the Commission's report to the legislature following the conclusion of the workshop process.

- **Insert your organization's name in the page header and title of each table.**
- **Propose 1 to 3 performance metrics for each metric performance area in Table 1.** You may add additional rows performance areas and metrics, as desired.
- **Include as much detail as possible in your proposals**. However, your proposals do not need to be completely developed at this stage. Blank boxes or unanswered questions are allowed if you currently lack the data or expertise to make a judgement about one or more components.
- **Consider the parameters outlined in 220 ILCS 5/16-108.18(e)(2),** including that performance metrics shall:
    - Measure outcomes and actual results where possible
    - Aim to achieve incremental improvements over baseline performance values and targets over 4-10 years
    - Be achievable by the electric utility and reasonably within the control of the utility
    - Not be required to be the same among electric utilities
    - Assume that the utility will adopt or implement the technology and equipment and make investments necessary to achieve the goal
    - Not have the sole expectation of reducing the workforce
- **Add any additional comments** regarding the metric performance areas in Table 2.

[1]Pursuant to [220 ILCS 5/16-108.18(b), (e)(1), & (e)(3)], a performance Metric is a manner of measurement for a particular utility activity. They will be used to: (a) better tie utility revenues to performance and customer benefits, (b) accelerate progress on goals, and (c) ensure equity and affordability of rates for all customers, including low-income customers, and hold utilities publicly accountable

Table 1: Performance Metric Proposals from Natural Resources Defense Council

METRIC PERFORMANCE AREA	DESCRIPTION	CALCULATION & DATA COLLECTION METHOD	ANNUAL PERFORMANCE TARGET(S)	INCENTIVES AND/OR PENALTIES
Reliability & Resiliency (Including power quality)	1. Average SAIDI 2. Average SAFI 3. SAIDI in disadvantaged and environmental justice communities. 4. SAFI in disadvantaged and environmental justice communities.	Suggested definitions for low-income / EJ areas: R3 and EJ communities as defined in the Climate and Equitable Jobs Act. These areas are defined at the census block group level. Improvements in SAIDI/SAFI in disadvantaged and environmental justice communities should be calculated so as not to double-count; perhaps indexed against overall SAIDI/SAFI.	Baseline requirement determined with third party input. Bonuses for exceeding it, penalties for falling short of it.	

Metric Performance Area	Description	Calculation & Data Collection Method	Annual Performance Target(s)	Incentives And/or Penalties
Peak Load Reduction	Reduction in demand during the 100 hours of the year when demand minus total wind and solar generation is greatest in the ISO region	MWh of reduced demand from total load during 100 "peak" hours as described. Data about load and real-time generation mix should be available directly from RTOs. Accounting for both past baselines and some consideration for projected load growth from electrification, but should strongly incent electrification load to be off-peak – e.g., the baseline should *assume* that some level of electrification load is shifted off-peak.	Straw proposal: 15% reduction over the next 10 years. Subject to discovery, etc. in more detailed proceedings.	Annual reduction needed to hit the performance target taken as a baseline. Some deadband on either side of that. Incentive for exceeding the target, penalties for falling short. In order to earn incentives on this metric, company must report the measures taken to reduce demand and share their cost and estimated benefit. Organic changes in demand not due to utility efforts should be accounted for, worked into the baseline, and not incented. Estimated benefit should include, at a minimum, avoided distribution system costs, avoided energy costs, and avoided pollution. It should also include methodology.

METRIC PERFORMANCE AREA	DESCRIPTION	CALCULATION & DATA COLLECTION METHOD	ANNUAL PERFORMANCE TARGET(S)	INCENTIVES AND/OR PENALTIES
Supplier Diversity				
Affordable Customer Delivery Costs (Emphasis on lower-income, equity-investment eligible and environmental justice communities)	1. Reduction in total residential arrears, broken by down census block group and zip code. 2. Reduction in total residential involuntary disconnections, broken down by census block group and zip code. 3. Reduction in total residential arrears in disadvantaged and environmental justice communities. 4. Reduction in overall total residential involuntary disconnections in disadvantaged and environmental justice communities.	Existing utility data on disconnections and arrears, overlaid on census block groups and average incomes as established by the US Census Bureau. Adjust for changes in energy prices when penalizing or rewarding for increases and reductions. Suggested definitions for low-income / EJ areas: R3 and EJ communities as defined in the Climate and Equitable Jobs Act. These areas are defined at the census block group level. Reductions in arrears and disconnections in disadvantaged and environmental justice communities should be calculated so as not to double-count; perhaps indexed against overall reductions.	Baseline requirement determined with third party input. Bonuses for exceeding it, penalties for falling short of it. Access to data will be critical.	

METRIC PERFORMANCE AREA	DESCRIPTION	CALCULATION & DATA COLLECTION METHOD	ANNUAL PERFORMANCE TARGET(S)	INCENTIVES AND/OR PENALTIES
Timely Interconnection Approval	Number of days the utility takes to complete interconnection requests. The baseline should be the timelines established in the interconnection requirements docket. Broken down by census block group and zip code.	Interconnection time should already be tracked. The process should acknowledge each step in the interconnection process, for DERs that involve multiple interconnection steps.	Timelines as established in upcoming interconnection docket. Bonuses for exceeding them, penalties for falling short. No bonuses for meeting determined timelines.	
Customer Service	Customer satisfaction surveys of customers who called customer service, broken down by census block group and zip code.	Surveys should ask customers about their include knowledge of efficiency, affordability, rate design, and DER programs. Surveys must be randomized and conducted by a third-party evaluator.	Exercise caution in setting targets and incentives given lack of baseline data. Other surveys may be a helpful baseline, but would need to be apples-to-apples comparisons.	Incentive should be modest if baseline is shaky.

Table 2: [OPTIONAL] Additional Comments on Performance Metrics Areas from Natural Resources Defense Council

METRIC PERFORMANCE AREA	COMMENTS
Reliability & Resiliency (Including power quality)	• • •
Peak Load Reduction	• • •
Supplier Diversity	• • •
Affordable Customer Delivery Costs (Emphasis on lower-income, equity-investment eligible and environmental justice communities)	• • •
Timely Interconnection Approval	• • •
Customer Service	• • •
[Insert Other Metric Here]	• • •

STEP 2: TRACKING METRIC PROPOSALS

Instructions. Use this template to **PROPOSE** tracking metrics that the ICC should consider pursuant to the directives in the Illinois Energy Transition Act.[2] Metric proposals will support stakeholder discussion of utility tracking metrics and inform the Commission's report to the legislature following the conclusion of the workshop process.

- **Propose 1 to 3 tracking metrics for each metric tracking area in Table 3.** You may add additional tracking areas and metrics, as desired.
- **Include as much detail as possible in your proposals**. However, your proposals do not need to be completely developed at this stage. Blank boxes or unanswered questions are allowed if you currently lack the data or expertise to make a judgement about one or more components.
- **Add any additional comments** regarding the tracking metric performance areas in Table 4.

[22]Pursuant to [220 ILCS 5/16-108.18(b), (e)(1), & (e)(3)], tracking metrics are for collecting and monitoring data to measure and report utility performance and establish future performance metrics.

Table 3: Tracking Metric Proposals from Natural Resources Defense Council

METRIC TRACKING AREA	DESCRIPTION	CALCULATION & DATA COLLECTION METHOD
Minimize GHG emissions and air pollutants, particularly in environmental justice and equity investment eligible communities	1. Number of customers who receive a gas bill, broken down by census block group and zip code 2. Number of customers who utilize smart water heaters and heat pumps, broken down by census block group and zip code 3. Number / percentage of customers with electric vehicles and electric vehicle charging stations (across customer classes, distinguishing type of electric vehicle – e.g., heavy duty vs. passenger); broken down by census block group and zip code 4. Pollution reductions attributable to load shedding or shifting programs	Item 1 may require coordination with gas companies. Pollution reductions attributable to load shedding/shifting programs should have transparent methodology and be subject to review by stakeholders, perhaps tabulated independently. Data should be publicly and easily available in both interactive and static formats.
Enhance grid flexibility, including via increased deployment of non-dispatchable resources, load balancing, and rate diversity	1. The total cost of interconnection in the utility's territory, broken down by DER type, census block group and zip code 2. Number of customers on various types of time-varying rates, broken down by customer class, census block group, zip code, customer income status, and possession of EV or customer-sited storage 3. Average usage and bills for customers that utilize DERs or rate programs, e.g., solar, storage, time-varying rates, smart water heaters, heat pumps, electric vehicles; broken down by census block group, zip code, customer income status	

METRIC TRACKING AREA	DESCRIPTION	CALCULATION & DATA COLLECTION METHOD
Ensure rates reflect cost savings attributable to grid modernization and DERs that allow the utility to defer or forgo traditional grid investments	1. Total number, monetary value, and MWh of third-party demand response programs 2. Total nameplate MW and MWh of DER production/storage capacity; number of customers with DER broken down by type of DER, census block group, and zip code 3. Total number of DER interconnections, broken down by type and census block group 4. Number of opportunities and number of completed projects to meet system needs with non-traditional investments, including geographic location and expected/achieved savings	These metrics should include input from third party vendors at some degree of independent evaluation.
Create and sustain full-time-equivalent jobs and opportunities for all segments of the population and workforce, including minority-owned businesses, women-owned businesses, veteran-owned businesses, and businesses owned by a person or persons with a disability		
Maximize and prioritize the allocation of grid planning benefits to environmental justice and economically disadvantaged customers and communities	1. Number of customers for which the utility has income data, broken down by census block group and zip code 2. Number and percentage of customers identified and low-income which are enrolled in low-income specific programs such as low-income EE or assistance programs, as well as cross-enrollment data for various low-income programs. 3. Grid investments by type, broken down by census block group and zip code.	

METRIC TRACKING AREA	DESCRIPTION	CALCULATION & DATA COLLECTION METHOD
Data Access and Customer/Vendor Satisfaction	1. Vendor satisfaction with utility interaction, broken down by type of vendor 2. Data availability. How many tracking metrics are easily available in a transparent, publicly accessible format. 3. Time for utilities to grant third parties data when required.	Data should be available in both static document form – e.g., searchable PDFs/Word Documents, and an interactive form, using a format similar to the EIA Electricity Data Browser.

Table 4: [OPTIONAL] Additional Comments on Tracking Areas from Natural Resources Defense Council

METRIC TRACKING AREA	COMMENTS
Minimize GHG emissions and air pollutants, particularly in environmental justice and equity investment eligible communities	• • •
Enhance grid flexibility, including via increased deployment of non-dispatchable resources, load balancing, and rate diversity	• • •
Ensure rates reflect cost savings attributable to grid modernization and DERs that allow the utility to defer or forgo traditional grid investments	• • •

METRIC TRACKING AREA	COMMENTS
Create and sustain full-time-equivalent jobs and opportunities for all segments of the population and workforce, including minority-owned businesses, women-owned businesses, veteran-owned businesses, and businesses owned by a person or persons with a disability	• • •
Maximize and prioritize the allocation of grid planning benefits to environmental justice and economically disadvantaged customers and communities	• • •
[Insert Other Metric Here]	• • •